

BELDOCK LEVINE & HOFFMAN LLP
99 PARK AVENUE, PH/26TH FLOOR
NEW YORK, N.Y. 10016

JONATHAN MOORE
DAVID B. RANKIN
LUNA DROUBI
MARC A. CANNAN
CYNTHIA ROLLINGS
JONATHAN K. POLLACK
HENRY A. DLUGACZ
STEPHEN J. BLUMERT
MYRON BELDOCK (1929-2016)
LAWRENCE S. LEVINE (1934-2004)
ELLIOT L. HOFFMAN (1929-2016)

TEL: (212) 490-0400
FAX: (212) 277-5880
WEBSITE: blhnyc.com

COUNSEL
BRUCE E. TRAUNER
PETER S. MATORIN
KAREN L. DIPPOLD
MARJORY D. FIELDS
EMILY JANE GOODMAN
JUSTICE, NYS SUPREME COURT, RET.
FRANK HANDELMAN

REF: **8289.0920**

WRITER'S DIRECT CONTACT:
646-496-2353
ben.meyers.esq@proton.me

March 12, 2024

VIA ECF

The Honorable John P. Cronan
United States District Judge
Southern District of New York
500 Pearl Street, Room 1320
New York, NY 10007

**Re: *Reclaim the Records and Alec Ferretti v. United States Department of State,*
No. 23 Civ. 1650 (JPC)**

Your Honor:

I am Of Counsel to Beldock Levine & Hoffman LLP, representing Plaintiffs in the above-referenced action brought pursuant to the Freedom of Information Act ("FOIA"). On behalf of Plaintiffs, I write to respectfully request a 14-day extension of the March 14, 2024 deadline for Plaintiffs' response to Defendant's motion for summary judgment. Under the revised briefing schedule, Plaintiffs' opposition brief would be due March 28, 2024 and Defendant's reply, if any, would be due on May 13, 2024. Defendant consents to this request.

This is the first request by Plaintiffs for an extension of the briefing schedule. I was only recently brought into the case after the departures of the two associates previously handling this matter at the end of December, and respectfully request this short extension to adequately consult with the Plaintiffs and finalize an appropriate response to Defendant's motion papers.

We thank the Court for its attention to this matter.

BELDOCK LEVINE & HOFFMAN LLP

Hon. John P. Cronan

March 12, 2024

Page 2

Respectfully submitted,


Benjamin Meyers

cc: Defendant's counsel (by ECF)